

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

WYATT BURY, LLC, et al., )  
Plaintiffs, )  
v. ) Case No. 4:25-cv-00084-RK  
CITY OF KANSAS CITY, MISSOURI, et )  
al., )  
Defendants. )

**DEFENDANTS' MOTION TO DISMISS**

COME NOW Defendants City of Kansas City, Missouri ("City") and Jackson County, Missouri ("County," collectively "Defendants") and respectfully move this Court to dismiss this action with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6) for the reasons more fully developed in the accompanying suggestions in support of this motion, which are incorporated herein.

WHEREFORE, Defendants respectfully request that this Honorable Court grant their motion and dismiss Plaintiffs' Complaint with prejudice and for all other relief that may be deemed just and proper.

Respectfully submitted,

OFFICE OF THE CITY ATTORNEY

By: /s/Tara M. Kelly  
Tara M. Kelly, #64624  
Mattison Harvey, #73746  
2800 City Hall, 414 E. 12th Street  
Kansas City, Missouri 64106  
Telephone: (816) 513-3117  
Facsimile: (816) 513-3133  
Email: tara.kelly@kcmo.org  
**ATTORNEYS FOR DEFENDANT  
CITY OF KANSAS CITY, MISSOURI**

OFFICE OF THE COUNTY COUNSELOR

By: /s/D. Ryan Taylor  
D. Ryan Taylor, #63284  
415 E. 12th Street, Suite 200  
Kansas City, Missouri 64106  
Telephone: (816) 881-3656  
Facsimile: (816) 881-3398  
Email: rtaylor@jacksongov.org  
**ATTORNEYS FOR DEFENDANT  
JACKSON COUNTY, MISSOURI**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing was sent to all counsel of record through the Court's e-filing system, this 24th day of March, 2025.

*/s/ Tara M. Kelly*

Tara M. Kelly